IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA COLUMBIA DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO. J. 22cx	5314
)		
)	18 U.S.C. § 371	
)	18 U.S.C. § 922(a)(6)	RECEIVED
)	18: U.S.C. § 922(a)(1)(A
VS.)	18: U.S.C. § 923(a)	APR 26 2022
)	18 U.S.C. § 924(a)(2)	AFR 20 LULL
)	18 U.S.C. § 2	FLORENCE, S.C.
)	18 U.S.C. § 924(d)(1)	FLORENOE, O.O.
)	28 U.S.C. § 2461(c)	
DAEJA BRYANA HODGE)		
KELSEY ANTONIO MCCALLUM)	SEALED INDICTM	ENT

COUNT 1

THE GRAND JURY CHARGES:

- 1. That beginning at a time unknown to the Grand Jury, but beginning from at least in or around June of 2020, and continuing up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, **DAEJA BRYANA HODGE and KELSEY ANTONIO MCCALLUM**, along with others both known and unknown to the Grand Jury, knowingly, willfully, and unlawfully did combine, conspire, confederate, and agree together and with each other:
 - (A) To make false statements with regard to the acquisition of firearms from licensed firearm dealers, in violation of Title 18, United States Code, Section 922(a)(6); and
 - (B) Not being licensed dealers of firearms, to willfully engage in the business of dealing in firearms, in violation of Title 18, United States Code, Sections 922(a)(1)(A), and 923(a);

- 2. In furtherance of the conspiracy and to affect the objects of the conspiracy, the following overt acts, among others, were committed in the District of South Carolina and elsewhere:
 - (A) From in or about June 2020, through January 2021, **DAEJA BRYANA HODGE** straw purchased firearms from federal firearms licensees in South Carolina, falsely representing herself to be the actual buyer of the firearms;
 - (B) From in or about June 2020, through January 2021, **DAEJA BRYANA HODGE**, who was then a resident of South Carolina, sold firearms to individuals located in Georgia, Maryland, North Carolina, and South Carolina;
 - (C) From in or about June 2020, through January 2021, **DAEJA BRYANA HODGE** transferred firearms to **KELSEY ANTONIO MCCALLUM**;
 - (D) From in or about June 2020, through January 2021, KELSEY ANTONIO
 MCCALLUM transported illegally acquired firearms from South Carolina to Maryland; and
 - (E) Counts 2-4 are incorporated herein, as if set forth verbatim, as overt acts; All in violation of Title 18, United States Code, Section 371.

COUNTS 2-4

THE GRAND JURY FURTHER CHARGES:

That on or about the date reflected below, in the District of South Carolina, the Defendant named below, aided and abetted by the Defendant named below, did knowingly make a false statement in connection with the acquisition and attempted acquisition of the firearm listed below from the licensed dealer listed below, which was intended and likely to deceive the said dealer with respect to a fact material to the lawfulness of the sale and disposition of the firearm under the provisions of Chapter 44 of Title 18, United States Code, in that the Defendant named below did execute a Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms Form 4473, Firearms Transaction Record, to the effect that she was the true purchaser of the firearm listed below, whereas in truth and in fact, she was not the true purchaser;

COUNT	DATE	DEFENDANT	FIREARMS	LICENSED DEALER
2	01/05/2021	DAEJA BRYANA HODGE, aided and abetted by KELSEY ANTONIO MCCALLUM	SCCY 9mm pistol; Smith and Wesson .380 caliber automatic pistol; and Smith and Wesson .40 caliber pistol	Palmetto State Armory, Columbia, South Carolina
3	01/05/2021	DAEJA BRYANA HODGE, aided and abetted by KELSEY ANTONIO MCCALLUM	SCCY 9mm pistol; Taurus .357 Magnum revolver; and Springfield Armory 9mm pistol	Pistols Plus, Columbia, South Carolina

3:22-cr-00344-MGL Date Filed 04/26/22 Entry Number 3 Page 4 of 6

4	01/09/2021	DAEJA BRYANA HODGE, aided and abetted by KELSEY	Taurus .38 caliber revolver and	Palmetto State Armory, Columbia, South Carolina
		ANTONIO MCCALLUM	Taurus 9x19mm pistol	

In violation of Title 18, United States Code, Sections 922(a)(6), 924(a)(2), and 2.

FORFEITURE

FIREARMS OFFENSES:

Upon conviction for felony violations of Title 18, United States Code, Section 922 as charged in this Indictment, the Defendants, **DAEJA BRYANA HODGE** and **KELSEY ANTONIO MCCALLUM**, shall forfeit to the United States all of the Defendants' rights, title, and interest in:

- (a) Any firearms and ammunition (as defined in 18 U.S.C. § 921)-
 - (1) involved in or used in any knowing violation of 18 U.S.C. § 922 or violation of any other criminal law of the United States or intended to be used in a crime of violence.

PROPERTY:

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the property which is subject to forfeiture upon conviction of the Defendants for the offenses charged in this Indictment includes, but is not limited to, the following:

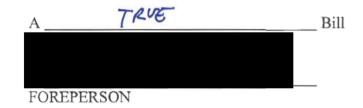
A. Firearms:

Multiple firearms purchased by Daeja Bryana Hodge and Kelsey Antonio McCallum

B. <u>Ammunition</u>:

Miscellaneous rounds of ammunition

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).



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